**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

Associated Recovery, LLC,	)	
	)	
Plaintiff,	)	
	)	No. 1:15-cv-1723-AJT-JFA
v.	)	
	)	
John Does 1-44,	)	
	)	
Defendants.	)	
	)	

In re:

744.COM	LNM.COM	VGJ.COM	YQT.COM
028.COM	LUOHE.COM	WYD.COM	YRN.COM
3DCAMERA.COM	MEQ.COM	XAQ.COM	YTE.COM
FNY.COM	OCU.COM	XFF.COM	YYG.COM
FX2.COM	PIXIE.COM	XSG.COM	ZDP.COM
FXF.COM	QMH.COM	YCX.COM	ZHD.COM
JTZ.COM	RUTEN.COM	YEY.COM	ZULIN.COM
KGJ.COM	SDU.COM	YGX.COM	ZZM.COM
KMQ.COM	SQG.COM	YJR.COM	
KOU.COM	TAOLV.COM	YJX.COM	
KXQ.COM	UHW.COM	YLZ.COM	
KXW.COM	VCZ.COM	YQP.COM	

**DECLARATION OF MS. REBECCA J. STEMPIEN COYLE IN SUPPORT OF
PLAINTIFF'S MOTION FOR DEFAULT JUDGMENT**

I, Rebecca J. Stempien Coyle, declare as follows:

1.   I am an attorney with the law firm LEVY & GRANDINETTI, attorney for the

Plaintiff, Associated Recovery, LLC (the "Plaintiff" or "Associated Recovery").

2.   I am fully familiar with the facts and circumstances set forth herein. This

Declaration is based upon my personal knowledge and a review of the files maintained by LEVY

& GRANDINETTI.

3.   I submit this declaration in support of Plaintiff's Motion for Default Judgment.

4.   Attached as Composite Exhibit A are "undeliverable" messages received in

response to emails sent to email address identified by the current registrant for the domain name

FXF.COM.

5.   Attached as Composite Exhibit B are email communications sent from an

individual believed to be the current registrant for the domain name 3DCAMERA.COM.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: March 4, 2016

Respectfully,

    /s/
Rebecca J. Stempien Coyle
(VSB# 71483)
Counsel for the Plaintiff
Associated Recovery, LLC
LEVY & GRANDINETTI
1120 Connecticut Avenue, N.W., Suite 304
Washington, D.C. 20036
Telephone (202) 429-4560
Facsimile (202) 429-4564
mail@levygrandinetti.com

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EXHIBIT A

Paul Grandinetti

From: Mail Delivery System <MAILER-DAEMON@wgfwd2.registrar-servers.com>
To: 15B93ABAFD0B47E787820FDA56E25280.PROTECT@WHOISGUARD.COM
Sent: Tuesday, February 16, 2016 2:14 PM
Subject: Undeliverable: U.S. District Court for the Eastern District of Virginia, Civil Action No. 1:15-cv-1723, Notice of Publication

This is the mail system at host wgfwd2.registrar-servers.com.

I'm sorry to have to inform you that your message could not be delivered to one or more recipients. It's attached below.

For further assistance, please send mail to postmaster.

If you do so, please include this problem report. You can delete your own text from the attached returned message.

        The mail system

<15B93ABAFD0B47E787820FDA56E25280.PROTECT@WHOISGUARD.COM>: unknown user:
   "15b93abafd0b47e787820fda56e25280.protect@whoisguard.com"

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Paul Grandinetti

From:	Microsoft Outlook
To:	15B93ABAFD0B47E787820FDA56E25280.PROTECT@WHOISGUARD.COM
Sent:	Wednesday, January 20, 2016 5:58 PM
Subject:	Undeliverable: U.S. District Court for the Eastern District of Virginia, Civil Action No. 1:15-cv-1723

se9.registrar-servers.com rejected your message to the following email addresses:

15B93ABAFD0B47E787820FDA56E25280.PROTECT@WHOISGUARD.COM
(15B93ABAFD0B47E787820FDA56E25280.PROTECT@WHOISGUARD.COM)
Your message couldn't be delivered because the recipient's email system reported the following error: '550-5.1.1 <15B93ABAFD0B47E787820FDA56E25280.PROTECT@WHOISGUARD.COM>: 550-Recipient address rejected: undeliverable address: unknown user: 550 "15b93abafd0b47e787820fda56e25280.protect@whoisguard.com"'. It's possible it's a temporary issue with their email system. Try to resend the message. If the problem continues, contact the recipient by some other means (by phone for example) and ask them to tell their email admin about the problem. Be sure to give them the error above, as it will better help them diagnose the problem.

For Email Administrators
This error is being returned by the recipient's email system but it doesn't include a valid, specific, enhanced SMTP status code, making it difficult to assess exactly what the problem is. Please carefully examine the error reported by the recipient's email system to help diagnose and troubleshoot the problem. Only the recipient's email admin will be able to fix this.

se9.registrar-servers.com gave this error:
5.1.1 <15B93ABAFD0B47E787820FDA56E25280.PROTECT@WHOISGUARD.COM>: Recipient address rejected: undeliverable address: unknown user:
"15b93abafd0b47e787820fda56e25280.protect@whoisguard.com"

Diagnostic information for administrators:

Generating server: BLUPR12MB0626.namprd12.prod.outlook.com

15B93ABAFD0B47E787820FDA56E25280.PROTECT@WHOISGUARD.COM
se9.registrar-servers.com
Remote Server returned '550-5.1.1 <15B93ABAFD0B47E787820FDA56E25280.PROTECT@WHOISGUARD.COM>: 550-Recipient address rejected: undeliverable address: unknown user: 550 "15b93abafd0b47e787820fda56e25280.protect@whoisguard.com"'

Original message headers:

DKIM-Signature: v=1; a=rsa-sha256; c=relaxed/relaxed;
 d=appriver3651007650.onmicrosoft.com; s=selector1-levygrandinetti-com;

```
h=From:To:Date:Subject:Message-ID:Content-Type:MIME-Version;
 bh=V+zFzrHNsPGNbZDj209vz1sz2IdryxEvvtX3oX1MAys=;


 b=WF2naRs4Y866Ai5EYGBXU/TXqDKWT57BryIOPGEUvDok5mvKB2oCcLr196aer/OrMUlR+2hE+wz2coLpl6L9TZc
GsEjnj3eGZ6EVi5mrcBmB5Q4eeyNTjZ5KSQKfX5mSYerVk2ZjUk+dtQBAqRDcOT+QoLCBxUh1qNyhWA7v6z0=
Received: from BLUPR12MB0628.namprd12.prod.outlook.com (10.163.217.22) by
 BLUPR12MB0626.namprd12.prod.outlook.com (10.163.217.20) with Microsoft SMTP
 Server (TLS) id 15.1.365.19; Wed, 20 Jan 2016 22:57:32 +0000
Received: from BLUPR12MB0628.namprd12.prod.outlook.com ([10.163.217.22]) by
 BLUPR12MB0628.namprd12.prod.outlook.com ([10.163.217.22]) with mapi id
 15.01.0365.024; Wed, 20 Jan 2016 22:57:32 +0000
From: Paul Grandinetti <mail@levygrandinetti.com>
To: "15B93ABAFD0B47E787820FDA56E25280.PROTECT@WHOISGUARD.COM"
        <15B93ABAFD0B47E787820FDA56E25280.PROTECT@WHOISGUARD.COM>
Subject: U.S. District Court for the Eastern District of Virginia, Civil
 Action No. 1:15-cv-1723
Thread-Topic: U.S. District Court for the Eastern District of Virginia, Civil
 Action No. 1:15-cv-1723
Thread-Index: AdFT1bGIh/at3fFYQdKYY6FfPLSp4g==
Date: Wed, 20 Jan 2016 22:57:32 +0000
Message-ID:
<BLUPR12MB0628976C8A7C92E9168AC37BCFC20@BLUPR12MB0628.namprd12.prod.outlook.com>
Accept-Language: en-US
Content-Language: en-US
X-MS-Has-Attach: yes
X-MS-TNEF-Correlator:
authentication-results: spf=none (sender IP is )
 smtp.mailfrom=mail@levygrandinetti.com;
x-originating-ip: [50.198.157.229]
x-microsoft-exchange-diagnostics:
1;BLUPR12MB0626;5:ijeZ9rHVo//CoaLKFf0rIq5dx2gwVGHY9YXseOImq8LW4viLC4J4SIjRqGJyqSzZrbzq5Ip
Ip2OGy0nXFqdiUZ0LmZYM5rRLs/34F1fgTVYLoyF/F1ZLTtMxTET9jipW5+vD4GpN9B9efySRXOy2IA==;24:dbAd
CPM9lljCi0e8Sw6bBMq6Jkj21veCgfQonpridDEsRu7hYef6fNl15QRdQTUYf3AWufAYpHITyR6Z0FDXs02XIcCr8
3aGQJ3Akwf4pe4=
x-microsoft-antispam: UriScan:;BCL:0;PCL:0;RULEID:;SRVR:BLUPR12MB0626;
x-ms-office365-filtering-correlation-id: b61d625d-5041-4b04-20e0-08d321ed1476
x-microsoft-antispam-prvs:
<BLUPR12MB0626ED50EC975A99C3E3FCE5CFC20@BLUPR12MB0626.namprd12.prod.outlook.com>
x-exchange-antispam-report-test: UriScan:;
x-exchange-antispam-report-cfa-test:
BCL:0;PCL:0;RULEID:(102615245)(601004)(2401047)(5005006)(520078)(8121501046)(3002001)(102
01501046);SRVR:BLUPR12MB0626;BCL:0;PCL:0;RULEID:;SRVR:BLUPR12MB0626;
x-forefront-prvs: 0827D7ACB9
x-forefront-antispam-report:
SFV:NSPM;SFS:(10009020)(199003)(189002)(106356001)(5008740100001)(450100001)(87936001)(92
566002)(5001960100002)(110136002)(2351001)(81156007)(107886002)(230783001)(189998001)(765
76001)(229853001)(1096002)(97736004)(2906002)(19580405001)(99936001)(558084003)(3846002)(
99286002)(122556002)(19300405004)(6116002)(19625215002)(40100003)(15975445007)(5002640100
001)(586003)(5003600100002)(19580395003)(2501003)(77096005)(790700001)(102836003)(1220700
001)(10400500002)(105586002)(86362001)(2900100001)(11100500001)(66066001)(5890100001)(509
86999)(74316001)(551944002)(33656002)(5004730100002)(54356999)(101416001)(16236675004);DI
R:OUT;SFP:1101;SCL:1;SRVR:BLUPR12MB0626;H:BLUPR12MB0628.namprd12.prod.outlook.com;FPR:;SP
F:None;PTR:InfoNoRecords;A:1;MX:1;LANG:en;
received-spf: None (protection.outlook.com: levygrandinetti.com does not
 designate permitted sender hosts)
spamdiagnosticoutput: 1:23
spamdiagnosticmetadata: NSPM
Content-Type: multipart/mixed;
        boundary="_008_BLUPR12MB0628976C8A7C92E9168AC37BCFC20BLUPR12MB0628namp_"
MIME-Version: 1.0
X-OriginatorOrg: levygrandinetti.com
X-MS-Exchange-CrossTenant-originalarrivaltime: 20 Jan 2016 22:57:32.1279
```

(UTC)
X-MS-Exchange-CrossTenant-fromentityheader: Hosted
X-MS-Exchange-CrossTenant-id: be5ccb87-15ca-463f-ae0d-a34a550db194
X-MS-Exchange-Transport-CrossTenantHeadersStamped: BLUPR12MB0626

Paul Grandinetti

From:	Microsoft Outlook
To:	15B93ABAFD0B47E787820FDA56E25280.PROTECT@WHOISGUARD.COM
Sent:	Saturday, January 02, 2016 2:08 PM
Subject:	Undeliverable: U.S. Federal In Rem Action Filed in Regard to Domain Name FXF.COM

Delivery has failed to these recipients or groups:

15B93ABAFD0B47E787820FDA56E25280.PROTECT@WHOISGUARD.COM
(15B93ABAFD0B47E787820FDA56E25280.PROTECT@WHOISGUARD.COM)
Your message wasn't delivered because, despite repeated attempts to contact it, the recipient's email system didn't respond.

Contact the recipient by some other means (by phone, for example) and ask them to tell their email admin that their email system isn't accepting connection requests from your email system. It's likely that the recipient's email admin is the only one who can fix this problem.

For more information, see Status code 4.4.7.

Diagnostic information for administrators:

Generating server: BLUPR12MB0626.namprd12.prod.outlook.com
Receiving server: BLUPR12MB0626.namprd12.prod.outlook.com
Total retry attempts: 186

15B93ABAFD0B47E787820FDA56E25280.PROTECT@WHOISGUARD.COM
1/2/2016 7:08:13 PM - Server at BLUPR12MB0626.namprd12.prod.outlook.com returned '550 4.4.7 QUEUE.Expired; message expired'

Original message headers:

```
Received: from BLUPR12MB0628.namprd12.prod.outlook.com (10.163.217.22) by
 BLUPR12MB0626.namprd12.prod.outlook.com (10.163.217.20) with Microsoft SMTP
 Server (TLS) id 15.1.361.13; Thu, 31 Dec 2015 19:08:10 +0000
Received: from BLUPR12MB0628.namprd12.prod.outlook.com ([10.163.217.22]) by
 BLUPR12MB0628.namprd12.prod.outlook.com ([10.163.217.22]) with mapi id
 15.01.0361.006; Thu, 31 Dec 2015 19:08:11 +0000
From: Paul Grandinetti <mail@levygrandinetti.com>
To: "15B93ABAFD0B47E787820FDA56E25280.PROTECT@WHOISGUARD.COM"
       <15B93ABAFD0B47E787820FDA56E25280.PROTECT@WHOISGUARD.COM>
Subject: U.S. Federal In Rem Action Filed in Regard to Domain Name FXF.COM
Thread-Topic: U.S. Federal In Rem Action Filed in Regard to Domain Name
 FXF.COM
Thread-Index: AdFD/eqlD4LU6XdsRY2KdDaeYF6Y8w==
```

1

```
Date: Thu, 31 Dec 2015 19:08:11 +0000
Message-ID:
<BLUPR12MB06281FF47CFF1ED6EE6A6066CFFE0@BLUPR12MB0628.namprd12.prod.outlook.com>
Accept-Language: en-US
Content-Language: en-US
X-MS-Has-Attach: yes
X-MS-TNEF-Correlator:
authentication-results: spf=none (sender IP is )
 smtp.mailfrom=mail@levygrandinetti.com;
x-originating-ip: [50.198.157.229]
x-microsoft-exchange-diagnostics:
1;BLUPR12MB0626;5:LuNSWgW+mFSMxMXKqnzUaVff+P5m/jRGEaUfvntOvmZ2Rg6xMTxm+YYBITCRgCCYoGZ7dFk
hVY1cYDdnT30hFn0ML35aSkyV/cVWdsq2QvvIU2prtiiEDHOd89d+65dW34A30JuQMnEVVJbi9kUDKw==;24:NkXg
1NQHHDscnzH/G8jc9BcNezbzseTPUvv77jUyRyQbZPuSTbkZN0oU+1zBNS65oWty4lUCvKgilT3vX6AqtaHiaBHoK
vvdSckQH9kZg/8=
x-microsoft-antispam: UriScan:;BCL:0;PCL:0;RULEID:;SRVR:BLUPR12MB0626;
x-microsoft-antispam-prvs:
<BLUPR12MB0626D4CDCED4104913179086CFFE0@BLUPR12MB0626.namprd12.prod.outlook.com>
x-exchange-antispam-report-test: UriScan:;
x-exchange-antispam-report-cfa-test:
BCL:0;PCL:0;RULEID:(601004)(2401047)(8121501046)(520078)(5005006)(3002001)(10201501046);S
RVR:BLUPR12MB0626;BCL:0;PCL:0;RULEID:;SRVR:BLUPR12MB0626;
x-forefront-prvs: 08076ABC99
x-forefront-antispam-report:
SFV:NSPM;SFS:(10009020)(189002)(199003)(10400500002)(99936001)(92566002)(110136002)(79070
0001)(5004730100002)(2501003)(101416001)(5002640100001)(551944002)(3846002)(74316001)(586
003)(99286002)(97736004)(5001960100002)(5890100001)(81156007)(6116002)(102836003)(1899980
01)(107886002)(1220700001)(5003600100002)(2900100001)(5008740100001)(450100001)(50986999)
(19580405001)(40100003)(19580395003)(86362001)(54356999)(122556002)(19625215002)(87936001
)(77096005)(33656002)(15975445007)(16236675004)(1096002)(229853001)(76576001)(106356001)(
2351001)(105586002)(19300405004)(66066001);DIR:OUT;SFP:1101;SCL:1;SRVR:BLUPR12MB0626;H:BL
UPR12MB0628.namprd12.prod.outlook.com;FPR:;SPF:None;PTR:InfoNoRecords;MX:1;A:1;LANG:en;
received-spf: None (protection.outlook.com: levygrandinetti.com does not
 designate permitted sender hosts)
spamdiagnosticoutput: 1:23
spamdiagnosticmetadata: NSPM
Content-Type: multipart/mixed;
        boundary="_005_BLUPR12MB06281FF47CFF1ED6EE6A6066CFFE0BLUPR12MB0628namp_"
MIME-Version: 1.0
X-OriginatorOrg: levygrandinetti.com
X-MS-Exchange-CrossTenant-originalarrivaltime: 31 Dec 2015 19:08:11.0500
 (UTC)
X-MS-Exchange-CrossTenant-fromentityheader: Hosted
X-MS-Exchange-CrossTenant-id: be5ccb87-15ca-463f-ae0d-a34a550db194
X-MS-Exchange-Transport-CrossTenantHeadersStamped: BLUPR12MB0626
```

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EXHIBIT B

Paul Grandinetti

From:	Taesong Chong <komorijin@gmail.com>
Sent:	Thursday, December 31, 2015 8:48 PM
To:	Paul Grandinetti
Subject:	Re: U.S. Federal In Rem Action Filed in Regard to Domain Name 3DCAMERA.com

Dear Rebecca,

I'm owner of 3dcamera.com and I have purchased it in 23 April 2014 at Namejet.com.
You can check it out contact via Namejet.com
Order#:556115293
I think that your client had dropped it. It has passed 1 year and half from when I purchased the domain.
It means your client didn't renewal it. because Domain must renewal once a year. If not renewal, I will drop and anyone can register it.

Or You client may be one of cybersquatter. because I don't understand. Why now? It has passed a year and half! If your client was real owner and stolen the domain. must took action at that time.

Now I'm running website with 3dcamera.com, If your client trying to still my domain. I'm going to take legal action.

Yours truly,
Taesong Chong

2016-01-01 4:05 GMT+09:00 Paul Grandinetti <mail@levygrandinetti.com>:

Dear Sirs:

The attached Complaint has been filed in the United States District Court for the Eastern District of Virginia regarding this domain name.

Pursuant to 15 USC 1125(d)(2)(A) we are providing you with notice of the Plaintiff's intent to proceed in rem in this action.

If you have any facts or law regarding this matter that you believe we should be made aware of, please let us know.

Regards,

Rebecca Stempien Coyle

Levy & Grandinetti

1120 Connecticut Ave NW
Suite 304
Washington DC 20036

Tel. (202) 429-4560

Fac. (202) 429-4564

mail@levygrandinetti.com

Attorneys for Plaintiff

Associated Recovery, LLC

Paul Grandinetti

From:	Taesong Chong <komorijin@gmail.com>
Sent:	Wednesday, January 20, 2016 7:26 PM
To:	Paul Grandinetti
Subject:	Re: U.S. District Court for the Eastern District of Virginia, Civil Action No. 1:15-cv-1723

I will sue you.

Taesong

2016-01-21 9:23 GMT+09:00 Taesong Chong <komorijin@gmail.com>:

 2016-01-21 7:54 GMT+09:00 Paul Grandinetti <mail@levygrandinetti.com>:

Dear Sirs:

Please see the attached.

Regards,

Rebecca Stempien Coyle

Levy & Grandinetti

1120 Connecticut Ave NW
Suite 304
Washington DC 20036

Tel. (202) 429-4560

Fac. (202) 429-4564

mail@levygrandinetti.com

Attorneys for Plaintiff

Associated Recovery, LLC

Paul Grandinetti

From:	Taesong Chong <komorijin@gmail.com>
Sent:	Thursday, January 21, 2016 8:02 PM
To:	Paul Grandinetti
Subject:	Re: U.S. District Court for the Eastern District of Virginia, Civil Action No. 1:15-cv-1723
Attachments:	3dcamera.jpg

Hello Rebecca,

My name is Taesong Chong and I'm owner of 3dcamera.com.
I have legally acquired the domain name at namejet.com well-known for domain name aftermarket in Apr 22 2014.

You can check the fact through namejet.com.

Name : Taesong Chong
Nmajet ID : taesong72
NameJet Invoice : 556115293
Acquisition date : Apr 22 2014

Namejet phone number 1-425-974-4687
URL : www.namejet.com

Currently, I'm making about 3d camera info site and being running. Please don't make it stop.

*Please check attached file. (Invoice at namejet : 556115293)

Best,
Taesong Chong

Phone : 82-10-6708-7724 (Not good at speaking english)
Email : komorijin@gmail.com

2016-01-22 9:58 GMT+09:00 Taesong Chong <komorijin@gmail.com>:
Hello Rebecca,

My name is Taesong Chong and I'm owner of 3dcamera.com.
I have legally acquired the domain name at namejet.com well-known for domain name aftermarket in Apr 22 2014.

You can check the fact through namejet.com.

Name : Taesong Chong
Nmajet ID : taesong72
NameJet Invoice : 556115293
Acquisition date : Apr 22 2014

Namejet phone number 1-425-974-4687
URL : www.namejet.com

Currently, I'm making about 3d camera info site and being running. Please don't make it stop.

*Please check attached file. (Invoice at namejet : 556115293)

Best
Taesong Chong

2016-01-22 7:09 GMT+09:00 Paul Grandinetti <mail@levygrandinetti.com>:

Dear Sirs:

Please see the attached.

Regards,

Rebecca Stempien Coyle

Levy & Grandinetti

1120 Connecticut Ave NW
Suite 304
Washington DC 20036

Tel. (202) 429-4560

Fac. (202) 429-4564

mail@levygrandinetti.com

Attorneys for Plaintiff

Associated Recovery, LLC